

REMARKS

This application has been reviewed in light of the Office Action dated July 21, 20, 2004. Claims 1, 2 and 4-35 are presented for examination, of which Claims 1, 8, 10, 12, 14, 19, 21, 23, 25, 30, 32 and 34 are in independent form, and have been amended to define still more clearly what Applicant regards as his invention.

Claims 1, 2 and 4-35 were rejected under 35 U.S.C. § 103(a) as being obvious from U.S. Patent 5,553,609 (Chen et al.) in view of U.S. Patents 5,943,478 (*Dean et al.*) and 5,032,979 (Hecht et al.).

The aspect of the present invention set forth in Claim 1 is a server for making it possible for a remote client, the client being of a plurality clients to control an image sensing device via a communication medium and for controlling to transfer video information, which has been captured by the image sensing device, to the plurality of clients via the communication medium. The server includes an input device and a notification device. The input device selectively enters a first request or a second request generated by a user different from any one of the plurality of clients. The first request is for acquiring information identifying the plurality of clients to which the video information captured by the image sensing device is transferred. The second request is for acquiring information identifying the remote client which the server gives a control privilege to control the optical system and orientation of the image sensing device remotely. The notification device, responsive to the entered request, reports the information identifying the plurality of clients or the remote client to the user.

Among other important features of Claim 1 is that the server gives to one of plural clients (a remote client) a control privilege to control the optical system and orientation

of the image sensing device, remotely and exclusively, reports information identifying the plurality of clients that receive the video captured by the image sensing device when the first requested by a user different from any of the plurality of clients, and reports information identifying the remote client when a second request is entered by the user.

Chen relates to a computer-based remote visual monitoring system intended for in-home patient care, using ordinary telephone lines. A supervisory center has access to patient records, and databases, for assigning patients to appropriate health care professionals, and for other tasks. Both master monitoring computers (linked to the control center) and slave monitoring computers (in patient homes) are provided, and real-time two-way communication is intended to be possible, via audio/visual equipment in the home. For example, scheduling information from the control center 22 (see Fig. 7) to a plurality of Master Monitoring Stations 24, where the scheduling information is used by the latter stations for linking with the Slave Monitoring Stations 26. Nothing in this (or elsewhere in *Chen*) is seen to teach or suggest giving a control privilege to control an optical system and orientation of an image sensing device remotely, and exclusively, as recited in Claim 1.

Moreover, even if *Dean* and *Hecht* are deemed to show all that they are cited for, such would not provide what is missing from *Chen* as a reference against Claim 1. *Dean*, in particular, is silent as to control of an image sensing device, and even if *Hecht* is deemed to teach a server detecting an event that has occurred in each client by using an audit trail of the clients, and managing clients by remotely mounting an audit file generated and held by the respective clients (see Fig. 4), since the *Hecht* server does not control the event that has occurred in the respective clients, the server cannot control any of the clients exclusively, and certainly does not teach or suggest giving control privilege to a single client

exclusively as recited in Claim 1. That claim is therefore believed to be clearly allowable over all three patents, taken separately or in any possible combination (assuming that any such combination would even be a permissible one).

Independent Claims 8, 10, and 12 are method, storage medium, and system claims, respectively, corresponding to server Claim 1, and are believed to be patentable for the same reasons as discussed above in connection with Claim 1.

With regard to independent Claims 14, 19, 21, 23, 25, 32 and 34, the Examiner asserts, without any further elaboration, that these claims all “have similar limitations as claims 1-2 and 4-7; therefore, they are rejected under the same rationale” (page 4 of the Office Action). Applicant cannot agree with this view. While Claims 8-13, also included in this statement by the Examiner, do have recitations similar to those of Claims 1, 2 and 4-7, Claims 14-35 are quite different.

For example, independent Claim 14 is directed to a server for making it possible for a remote client to control an image sensing device via a communication medium and for controlling to transfer video information, which has been captured by the image sensing device, to the client via the communication medium. The server of Claim 14 comprises a storage device, adapted to store information relating to objects in a zone within which images can be sensed by controlling the sensing direction of the image sensing device. Also provided are an input device, adapted to enter a request, generated by a user different from the client, for status information regarding the image sensing device, and a notification device, adapted to extract from said storage device, responsive to the entered request, information relating to an object whose image is being sensed by the image sensing device, and to report the extracted information to the user.

Thus, it is not at all true that Claim 14 contains recitations similar to those of Claims 1, 2 and 4-7, and the rejection of Claim 14 (and of Claims 15-35) is based on a false reading of those claims -- and in fact actually fails to address any of the recitations in the body of Claim 14. Thus, to say the least, the Office Action has failed to make out even a prima facie case of obviousness against any of Claims 14-35, and if any of those claims is rejected in the Examiner's next Action, such Action must be made non-final.

Applicant submits, however, that in fact Claims 14-35 are allowable over the art applied in the Office Action. Nothing has been found in *Chen*, *Dean* or *Hecht* that would teach or suggest a server that stores information relating to objects in a zone within which images can be sensed by controlling the sensing direction of an image sensing device, and extracting from the storage device, responsive to an entered request, information relating to an object whose image is being sensed by the image sensing device, and reports the extracted information to the user, as recited in Claim 14. For at least that reason, Claim 14 is deemed to be clearly allowable over any proper combination (if any exists) of those three patents.

Accordingly, Applicant believes that Claim 14, and similar Claims 19, 21, 23, 25, 32 and 34, are clearly patentable over the cited prior art.

A review of the other art of record has failed to reveal anything which, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as references against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the

invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and early passage to issue of the present application.

Applicant's undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Leonard P. Diana", is written over a horizontal line.

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